

**Federal Defenders
OF NEW YORK, INC.**

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November 4, 2021

BY ECF

The Honorable Judge Richard Berman
United States District Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. John Dupont
19 CR. 444 (RMB)**

Dear Judge Berman:

I write to request a brief extension of the defense's sentencing submission deadline to provide the defense with adequate time to prepare Mr. Dupont's submission following his recent critical health episode and multi-week hospitalization.

Mr. Dupont was transported to Long Island Jewish Medical Center on October 6, 2021, for chest pain and vomiting. I was informed on November 1 that Mr. Dupont has been returned to Windsor Park Nursing Home and is now in stable condition. My office served a subpoena for Mr. Dupont's hospital records for information on his treatment and condition on October 12 and were informed by the hospital on November 3 that the records are still in the process of being prepared.

To ensure that I have adequate time to receive, review, and incorporate Mr. Dupont's treatment records from this recent multi-week hospitalization, I write to request an extension of the defense deadline of two weeks. Mr. Dupont's physical health and age will be a critical piece of the defense's sentencing submission, therefore this information is of high importance. The brief extension is also necessary given Mr. Dupont's recent release from the hospital. I have not had the opportunity to consult with Mr. Dupont on the sentencing submission since his release from the hospital.

I request permission to file Mr. Dupont's sentencing submission on November 19, with the Government's submission due one week later on November 26. I also request that the November 18 conference remain so that the defense can provide an update to the Court on Mr. Dupont's physical status and his preference on how to proceed with the sentencing hearing. I have reached out to AUSA Rossmiller regarding this request and am awaiting a response.

Respectfully submitted,

/s/

Zawadi Baharanyi
Assistant Federal Defender
(917) 612-2753

cc: AUSA Alexander Rossmiller (by ECF)